Exhibit 6

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Case No. 1:15-cv-06119
--x
STEVEN E. GREER, MD,
Plaintiff,
- against -
DENNIS MEHIEL, ROBERT SERPICO, THE BATTERY PARK CITY AUTHORITY, HOWARD MILSTEIN, STEVEN ROSSI, JANET MARTIN, MILFORD MANAGEMENT, AND MARINERS COVE SITE B ASSOCIATES,

Defendants.

--x

April 25, 2017
2:02 p.m.

CONFIDENTIAL

DEPOSITION of STEPHEN ROSSI, one of the Defendants herein, held at the offices of Rosenberg & Estis, P.C., located at 733 Third Avenue, New York, New York 10017, before Anthony Giarro, a Registered Professional Reporter and a Notary Public of the State of New York.

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A P P E A R A N C E S :

STEVEN E. GREER, MD
Pro Se Plaintiff
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(via telephone)

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733 Third Avenue
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BY: JUSTIN J. GUNNELL, ESQ.
MICHAEL TREMONTE, ESQ.
(via telephone)

ALSO PRESENT:
ABBY GOLDENBERG, ESQ.

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S T I P U L A T I O N S

IT IS HEREBY STIPULATED AND AGREED, by and among counsel for the respective parties hereto, that the filing, sealing and certification of the within deposition shall be and the same are hereby waived;

IT IS FURTHER STIPULATED AND AGREED that all objections, except as to form of the question, shall be reserved to the time of the trial;

IT IS FURTHER STIPULATED AND AGREED that the within deposition may be signed before any Notary Public with the same force and effect as if signed and sworn to before the Court.

* * *

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A I believe so.

Q Have you returned to work yet at Milford Management?

MS. RIEGEL: Objection. And I'm directing him not to answer. His medical condition is not at issue.

DR. GREER: I didn't mention the word "medical" at all.

Q Mr. Rossi, are you working now at Milford Management?

A Yes.

Q What do you do there at Milford Management? Just describe your job?

A I'm a vice president and director of management services. And I oversee 19 properties, some of them owned by the Milstein family, others are condominiums; and also, we do third-party management.

Q And what is Mariners Cove Site B Associates?

A They are the sponsor for Liberty Court. They were the developers

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understand what you're asking.

DR. GREER: Sure.

Q What I'm trying to get at: Was I a renter at 35F at 200 Rector Place and for how long?

A Yes. I believe the lease may go back to 2002, 2003, the initial lease.

Q Are you aware that someone at Milford Management or Mariners Cove decided to not renew my lease in early 2014? Are you aware of that?

A Yes.

Q Who at Milford Management or Mariners Cove personally made that decision?

A I did.

Q Did anyone instruct you to make that decision or did you come up with it on your own?

A No one instructed me to make that decision.

Q In January of 2014, do you recall me being in your office at 99

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Battery, shaking your hand on friendly terms and discussing a matter that related to a lawsuit; one of the tenants in your building was suing over whether they could have a dog or not? Do you recall us talking about that in January 2014?

A Yes.

Q At what point after that conversation? What was the date, to the best of your recollection, that you decided not renew any lease? Was it January, February? When was it?

A My recollection would have been March; could have been February; either February or March.

Q Did you instruct Clive Spagnoli to send me a letter informing me that the lease would not be renewed?

A Yes.

Q Did you give any explanation to Clive Spagnoli as to why you were instructing him to do that?

A I do not recall.

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Q Who is Robert Serpico?

A I believe his last position was CFO, chief financial officer, of Battery Park City Authority.

Q Had you ever met Mr. Serpico in person?

A Yes.

Q For how many years or decades have you known Mr. Serpico?

A I've known Bob probably since 1986, '87.

Q Do you meet regularly, once a month, for example, to discuss any business matters?

A No.

Q Since January of 2013, so the last few years, have you ever met Robert Serpico at a coffee shop or a restaurant in the neighborhood?

A Yes.

Q What was the purpose of that meeting? Was it to discuss anything about Steven Greer?

A No.

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Q Was it official business dealing with taxes or pilot fees?

A I would say it was a combination of the relationship I had with Bob on a personal basis and also trying to navigate some business issues.

Q Why would you prefer to meet at a coffee shop instead of the BPCA offices or your office?

A No reason. It was convenient.

Q Did Robert Serpico ever e-mail you or call you sometime in the year 2013, asking you to investigate the status of Steven Greer's rental apartment lease, whether I was late in rent or any other matters regarding me?

A I don't believe so.

Q Can you be more certain? Yes or no?

MS. RIEGEL: Objection. He answered your question, Dr. Greer.

DR. GREER: I need a yes or no.

Steven Greer?

MS. RIEGEL: Objection. You can answer it if you recall.

A I believe there was an e-mail that you were copied on.

Q Has Janet Martin ever told other employees at Emigrant Bank or Milford Management that I was unstable, crazy or a scary guy?

MS. RIEGEL: Objection; beyond the scope of permissible discovery. This claim has been dismissed. And I'm directing the witness not to answer.

Q Who is Lorraine Doyle?

A Property manager.

Q At Milford Management?

A Yes.

Q Is she still at Milford Management?

A She retired.

Q Before she retired -- when did she retire? What year did she retire?

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A I believe it's 2015. Or it might have been '14 --

Q Before her retirement, describe her job role. And did she report to you?

MS. RIEGEL: Dr. Greer, you cut Mr. Rossi off. And he was finishing his answer.

THE WITNESS: Yeah.

A Just to be clear, she either retired May of 2014 or May of 2015.

Q Did she report to you and what was her job role?

A She reported to me. And she managed some of the properties in Battery Park City.

Q Did Lorraine Doyle play any role in the decision that you made to not renew my apartment lease?

A Yes.

Q That was a "yes"?

A That was a "yes."

Q Explain how. What role did she play?

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A It was based on a review of all the facts, surrounding your occupancy of Apartment 35F.

Q I need you to be specific.

What facts are you referring to?

A It would have been the rental history. We discussed the employees that were coming forward with issues regarding yourself and the resident complaints from not only the residents, some of the residents in Liberty Court but also some of the adjacent apartments.

Q What do you mean by adjacent apartments? A totally different building or what?

A No. The adjacent apartments to 35F would have included 35G, 35E are two that come to mind.

Q Did Robert Serpico and Lorraine Doyle ever meet in person, to your knowledge?

MS. RIEGEL: Objection. You

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Q I believe you filed affidavits yourself and other writings by your lawyers, claiming that my lease was not renewed, essentially, because I was a troublemaker or bothering or harassing other tenants. Can you cite some examples?

MS. RIEGEL: Objection. If you have documents you want to show him, I'm happy to show them to him, otherwise your characterization of his e-mail -- of his affidavits is really not appropriate, Dr. Greer.

Q Mr. Rossi, can you cite any examples of me harassing or bothering other tenants at 200 Rector Place?

MS. RIEGEL: Objection. You can answer.

A Yes.

Q What were they? Please elaborate.

A The resident, the owner at 35E, reached out to us to complain about yourself with music that was blaring that prevented her from sleeping at three o'clock in the morning. I have similar complaints from Kiyomi Kawaguchi and Luigi, her partner from 35G of a similar nature.

Q I was 35F?

A Right.

Q When you walk out my door in the hallway, the most adjacent apartment, which one is that? E or G?

A If we're looking at the hallway and your door is on the right, 35G would be to the left.

Q Is that the three-bedroom unit?

A That would be the E, 35E on the other hallway. And the master bedroom backs up to your living room.

Q Okay.

What year or months? When did these complaints take place, happen?

A Probably late 2013, 2014. Some of them were initiated with phone calls. And later on, we received

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e-mails. And also, the resident of 35E came to the offices.

Q I don't recall receiving any communications from your offices, from Gus, from you, anyone relaying these complaints to me.

Did you produce any documents?

A We had the -- the overnight concierge visited you.

Q When was that?

A I don't have any dates, exact dates.

Q Who was the overnight concierge?

A Michael Mutos, Jose Rivera. And there was probably a third. We have three people in the lobby on the overnight. I don't recall.

Q Which ones supposedly came up to the hallway, up to 35F and personally visited me?

A Michael Mutos.

Q So that's one issue you

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think happened in 2013.

Did you send me any sort of letter or e-mail or anything?

A It wouldn't have come from my direction. It would be from the property manager. So I'm unable to answer that.

MS. RIEGEL: And, Dr. Greer, I'm going to ask you to please not recharacterize the testimony since Mr. Rossi testified it was either '13 or '14.

DR. GREER: Okay.

Q 35G, explain how many apartments away that is from 35F and elaborate on that complaint.

A I've known Kiyomi Kawaguchi. She's an original purchaser from that apartment from back in the late '80s. And she works for UNICEF. And she travels. So she's not in New York 12 months a year.

But when she comes to New York, she's here for two or three months

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at a time. And same complaints, you know: Stereo three o'clock, two o'clock morning, five o'clock in the morning. It's very disruptive to their sleep patterns.

Q Anyone from Milford Management or Mariners Cove or any of your companies, did anyone notify me of a complaint from 35G?

A I'm not able to answer that.

Q You mentioned two noise complaints.

The 35G noise complaint, what years did that take place, what month?

A '13 to '14, 2013, 2014.

Q So we discussed two incidents.

What else do you know? Any other complaints about me?

A You know, not to me directly but to Lorraine. I don't have any others.

Q Any of these tenants who

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supposedly made complaints about me, will they be a witness for you at the trial?
MS. RIEGEL: Objection. He's not answering that question, Dr. Greer. When you are entitled to know who our trial witnesses are, you'll get them.
A Yeah.
Just to go back on that last question, as I had mentioned previously, we had various employees come forward on issues that they were having with you on the overnight shift.
Q Let's take that one at a time.
Which employees do you want to talk about first?
A Michael Mutos.
Q You're claiming Michael Mutos had a complaint about me.
What was it?
A You were belligerent, just instigating -- trying to instigate a reaction from Michael.

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MS. RIEGEL: Objection. You can answer if you can.

A I would not be able to answer that definitively.

Q Is it the policy when a doorman downstairs receives a noise complaint to personally come up to the apartment rather than call?

MS. RIEGEL: Objection.

A They would call first before coming up to the apartment.

Q Did Mr. Mutos call me before he came up to my apartment?

MS. RIEGEL: Objection.

A Don't know.

Q So that's one employee. You said there were other employees who were complaining about me.

Who do you want to talk about next?

A We have a letter from the union where Jose Rivera filed a harassment complaint against you.

Q This complaint was brought

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discovery. It's irrelevant. And I'm directing the witness not to answer. You can take it up with the judge.

DR. GREER: Mr. Rossi is the one who brought this up. By definition, it is the opposite of irrelevant; okay? So you're not going to answer. Okay.

Q So Jose Rivera, Mr. Mutos.

What other employees complained about me?

A Rudolfo Rodriguez.

Q That name doesn't even ring a bell to me.

Who is Rudolfo Rodriguez?

A He would have been working on the overnight shift in Liberty Court Condominium.

Q Can you describe what he looks like?

A I can't.

Q What complaints -- what was the nature of the complaint about me that he made?

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A Again, it was the conversations where you would try to instigate a reaction from an employee to set them off.

Q When did this incident allegedly happen?

A I don't have any exact date.

Q What year?

A I wouldn't be able to give you an exact date or year.

Q Was it before or after you initiated housing court litigation with me?

A Unable to answer.

Q Did you ever send me any e-mail or letter about these complaints?

A Again, it would not have come from my office.

Q Have you or any of your companies ever fired a doorman working at 200 Rector Place after I reported egregious misconduct on the part of the doorman?

MS. RIEGEL: Objection;

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beyond the scope of permissible discovery. And I'm directing the witness not to answer.

Q Do you recall a complaint I made with city agencies, the HPD, the fire department and to Gus and to you that Jose Rivera refused to call 911 when there was a major fire in the building with smoke going all the way up to my apartment on 35 and Jose refused to call the fire department; instead, he tried to investigate it himself? Are you aware of my complaint about that?

MS. RIEGEL: Objection; beyond the scope of permissible discovery; objection to form; objection to relevance. I'm directing him not to answer.

Q You have argued that I was essentially chronically late in paying my rents since at least 2012. Would you agree with that?

A Yes.

Q Why then did you renew my

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lease as recently as May of 2013?

A That would have been based on probably a conversation that you had with Lorraine Doyle, that you would bring your account current.

Q Are you aware of the documents that I produced that are scanned check images from my bank to your Milford Management with the 1st of the month stamped on them from the Year 2013? And then I believe your lawyers found checks older than that. Are you aware of the scanned check images of mine?

MS. RIEGEL: Objection to form. Can you rephrase that? For the life of me, I don't understand it, nor does Mr. Rossi.

DR. GREER: Sure.

Q Did I, Steven Greer, pay my rent with checks for all of the months for the year 2013? Did I submit to you checks that had the 1st of the month dated on them?

A I would not know.

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Q Then how do you know I was late in rent?

A I reviewed our billing system which has the charges and the collections and the arrearage. We have an internal system.

Q Well, I was going to ask you about that. But let's do it now.

Describe that internal system. Is it a professional software or is it a program? Describe that accounting system.

A Yeah. It's a professional accounting system. It's not in-house. And we buy the software. And we have access to it.

Q I have that planned a few questions down the road.

If I was late in rent, why did you renew my lease in 2010?

A I don't know.

Q I'm just going to ask four more like this.

If I was late in rent, why